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AO 91 (Rev. 11/11) Criminal Complaint

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

4

United States of America

v.

Corey Charles Cook

Case: 2:19-mj-30525

Assigned To : Unassigned

Assign. Date : 10/3/2019

Description: CMP USA v. COOK (SO)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 19, 2019, in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

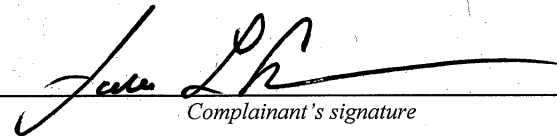
18 U.S.C. § 1361

*Offense Description*

Depredation against government property

This criminal complaint is based on these facts:

See affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*

Special Agent Todd Allen, DHS/OIG

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

10/3/19City and state: Detroit, Michigan

*Judge's signature*

Hon. R. Steven Whalen, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Todd L. Allen, being duly sworn, depose and state as follows:

**I. INTRODUCTION**

1. I am a Special Agent with the Department of Homeland Security, Office of Inspector General. I started with DHS-OIG in September of 2010. I previously worked for the Treasury Inspector General for Tax Administration and the Criminal Investigation Division of the Internal Revenue Service. During my career, I have directed or assisted in investigations concerning criminal violations of Titles 18, 21, 26, and 31 of the United States Code.

2. The facts and statements in this affidavit include information developed by DHS-OIG. This affidavit is for the limited purpose of securing a criminal complaint. I have set forth only the facts that I believe are necessary to establish the probable cause and not every fact known to me concerning this investigation.

3. Probable cause exists that, on July 19, 2019, in the Eastern District of Michigan, Corey Charles Cook vandalized government property by spray-painting words on a federal building sign, in violation of 18 U.S.C. § 1361 (depredation of government property).

## II. THE INVESTIGATION

4. In July of 2019, the DHS-OIG received information that the Rosa Parks Federal Building (RPFB) street sign had been vandalized: the words “FUCK ICE” had been spray painted on the sign.

5. After learning of the incident, I reviewed video surveillance footage from the RPFB. I identified a portion of surveillance footage on July 19, 2019, from 7:53 to 7:54 p.m., in which an individual spray painted “FUCK ICE” on the RPFB sign.

6. The video depicts two masked individuals approaching the RPFB from Jefferson Ave. One individual, S1, wearing all black, drops a black backpack on the ground in front of the building and walks out of the view of the camera.

7. The second individual, S2, is dressed in black clothing but is also wearing a distinctive yellow reflective construction vest. S2 walks to the RPFB sign, takes out a can, shakes the can, and spray paints the words “FUCK ICE” on the sign. He then walks to the backpack that S1 dropped, places the can of spray paint in the backpack, and walks away. S2's arms are visible in the video and have visible, distinctive tattoos.

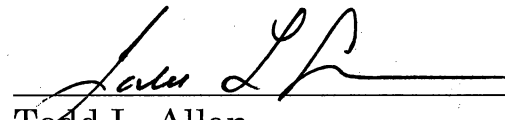
8. On July 21, 2019, Deportation Officer (and FBI TFO) Wendy Kerner was notified of the vandalism of the RPFB sign. Kerner reviewed the video surveillance as well as government video and open source pictures, videos, and information. Through her investigation, Kerner identified S2 as Corey Charles Cook.

9. Law enforcement officers spoke to Cook on October 3, 2019. After providing Cook his *Miranda* rights, Cook admitted in writing that he vandalized (spray painted) the RPFB sign.

### III. CONCLUSION

10. Based on the aforementioned information, I respectfully submit that there is probable cause to believe Corey Charles Cook violated 18 U.S.C. § 1361, depredation of government property.

Respectfully submitted,

  
\_\_\_\_\_  
Todd L. Allen  
Department of Homeland Security

Sworn to and subscribed before me  
this 3<sup>rd</sup> day of October, 2019.

  
\_\_\_\_\_  
Hon. R. Steven Whalen  
United States Magistrate Judge